

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JENNIFER BISHOP**

**CHAPTER 7**

**DEBTOR**

**CASE NO. 18-11657 JDW**

**MOTION TO AVOID LIEN**

**COMES NOW**, Debtor(s), by and through his/her/their attorney of record, and moves the Court, pursuant to §522(f) of the United States Bankruptcy Code, to avoid the lien of the Creditor, **First Metropolitan Financial, UCC File No. 20172480386A**, on the grounds that the security in household goods for said debt is a non-possessory, non-purchase money security agreement. That said security is exempt property.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) move(s) this Honorable Court to order the avoidance of the above lien/judgment.

RESPECTFULLY SUBMITTED,

/s/Karen B. Schneller

KAREN B. SCHNELLER, MSB # 6558  
ROBERT H. LOMENICK, JR., MSB #104186  
SCHNELLER & LOMENICK, P.A.  
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**CERTIFICATE OF SERVICE**

I, Karen B. Schneller/Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day mailed, via electronic delivery or postage prepaid, a true and correct copy of the above and foregoing Motion To Avoid Lien to:

First Metropolitan Financial  
371 W. Bankhead Street  
New Albany, MS 38652

Honorable Selene Maddox  
Chapter 7 Trustee  
362 North Broadway Street  
Tupelo, MS 38804

U. S. Trustee  
501 East Court Street, Suite 6-430  
Jackson, Mississippi 39201

This the 31st day of May, 2018

/s/Karen B. Schneller  
KAREN B. SCHNELLER  
ROBERT H. LOMENICK, JR.